

1 KATRINA J. LEE (SBN 191142)
klee@nossaman.com
2 STEPHEN N. ROBERTS (SBN 62538)
sroberts@nossaman.com
3 NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP
50 California Street, Thirty-Fourth Floor
4 San Francisco, California 94111-4707
Telephone: (415) 398-3600
5 Facsimile: (415) 398-2438

6 Attorneys for Defendant
TORRES DE ANGUIZ, S.L.

7 J. SCOTT GERIEN (SBN 184728)
sgerien@dpf-law.com
8 MEGAN FERRIGAN HEALY (SBN 229177)
mhealy@dpf-law.com
9 DICKENSON, PEATMAN & FOGARTY
809 Coombs Street
10 Napa, CA 94559
Telephone: (707) 252-7122
11 Facsimile: (707) 255-6876

12 Attorneys for Plaintiff
13 MIGUEL TORRES, S.A.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 MIGUEL TORRES, S.A.

18 Plaintiff,

19 vs.

20 TORRES DE ANGUIZ, S.L.,

21 Defendant.

Case No: C08-01288 WHA

ASSIGNED FOR ALL PURPOSES TO:
WILLIAM ALSUP

**AMENDED STIPULATION AND
[PROPOSED] ORDER RESCHEDULING
CASE MANAGEMENT CONFERENCE
AND EXTENDING DEADLINES**

Accompanying Documents:

**1. Declaration of Katrina J. Lee in Support
Thereof.**

Date Action Filed: March 5, 2008
Trial Date: None Set

1 Plaintiff Miguel Torres, S.A., and Defendant Torres de Anguix, S.L., by and through their
 2 respective counsel, hereby request that the Court enter an Order approving of the Stipulation set forth
 3 herein. Accompanying this Amended Stipulation and [Proposed] Order is the Declaration of Katrina J.,
 4 Lee in support thereof. The Declaration sets forth reasons why this request should be granted, including,
 5 among other things, that Defendant's business is based in Spain, Defendant required assistance with
 6 translation of documents related to this case, and Defendant only within the past week retained counsel
 7 in the United States.

8 STIPULATION

9 Plaintiff Miguel Torres, S.A., and Defendant Torres de Anguix, S.L., by and through their
 10 respective counsel, hereby stipulate and agree to the following:

11 1. Defendant Torres de Anguix, S.L. ("Defendant"), has an extension up to and including
 12 June 9, 2008 to file and serve its Answer to the Complaint.

13 2. Certain deadlines set in the Court's March 5, 2008 order Setting Initial Case Management
 14 Conference and ADR Deadlines shall be extended as follows:

15 a. The last day for the parties to meet and confer regarding initial disclosures, early
 16 settlement, ADR process selection, and discovery plan shall be extended from May 27, 2008 to June 30,
 17 2008.

18 b. The last day for the parties to file a Joint ADR Certification with Stipulation to
 19 ADR Process or Notice of Need for ADR Phone Conference would be extended from May 27, 2008 to
 20 June 30, 2008.

21 c. The last day for the parties to file a Rule 26(f) Report, complete initial
 22 disclosures, or state objection in the Rule 26(f) Report would be extended from June 9, 2008 to July 14,
 23 2008.

24 d. The date of the Initial Case Management Conference, originally set as June 12,
 25 2008 in the March 17, 2008 Clerk's Notice Scheduling Initial Case Management Conference On
 26 Reassignment ("Clerk's Notice"), shall be rescheduled to July 24, 2008, at 11:00 a.m., or to such date

27 ///

28 ///

1 and time thereafter that is available on the Court's calendar. The Joint Case Management Conference
2 Statement shall be filed no later than July 17, 2008.

3
4 Dated: May 29, 2008

KATRINA J. LEE
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP

5
6
7 By: _____
KATRINA J. LEE

8 Attorneys for Defendant
9 TORRES DE ANGUIZ, S.L.

10
11 DATED: May 29, 2008

MEGAN FERRIGAN HEALY
DICKENSON, PEATMAN & FOGARTY

12
13
14 By: 
MEGAN FERRIGAN HEALY

15 Attorneys for Plaintiff
16 MIGUEL TORRES, S.A.

17
18 * * * * *

19 IT IS SO ORDERED.

20 Dated: MAY _____, 2008

21 _____
Hon. WILLIAM ALSUP
22 DISTRICT COURT JUDGE

1 and time thereafter that is available on the Court's calendar. The Joint Case Management Conference
2 Statement shall be filed no later than July 17, 2008.

3
4 Dated: May 29, 2008

KATRINA J. LEE
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP

5
6
7 By: /s/ KATRINA J. LEE
KATRINA J. LEE

8
9 Attorneys for Defendant
TORRES DE ANGUIZ, S.L.

10
11 DATED: May 29, 2008

MEGAN FERRIGAN HEALY
DICKENSON, PEATMAN & FOGARTY

12
13
14 By: _____
MEGAN FERRIGAN HEALY

15
16 Attorneys for Plaintiff
MIGUEL TORRES, S.A.

17
18 * * * * *

19 IT IS SO ORDERED.

20 Dated: MAY _____, 2008

21 _____
Hon. WILLIAM ALSUP
22 DISTRICT COURT JUDGE